

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: * CASE NO 11-05316/ESL
*
LILLIAM LEONOR LINARES FUENTES * CHAPTER 13
*
DEBTOR *

**REPLY TO MOTION REQUESTING DISMISSAL DOCKET NO.64
AND MOTION FOR EXTENSION OF TIME**

TO THE HONORABLE COURT:

COMES NOW, **LILLIAM LEONOR LINARES FUENTES**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On June 21, 2016, Reliable Financial Services, Inc. ("Reliable") filed a *Motion Requesting Dismissal*, docket no. 64, basically alleging that the debtor has accumulated two (2) direct post-petition arrears with said creditor.

2. The debtor met with the undersigned attorney regarding this matter and respectfully submits that she did incur in said post-petition arrears due to certain economic problems.

3. The debtor hereby respectfully informs that on July 18, 2016 she made one (1) \$593.00 payment, to partially cure the arrears owed to Reliable. Attached is copy of said payment.

4. The balance owed on the Reliable arrears will be paid by the debtor within the next thirty (30) days, thus, the debtor needs an extension of time of thirty (30) days within to obtain funds to cure the balance on the arrears and file evidence of curing the arrears, which extension of time to expire on August 20, 2016.

WHEREFORE, the debtor requests this Honorable Court grant the present reply and grant the requested extension of time, in the above captioned case.

Page – 2 –
Debtor's Motion for Extension of Time
Case no. 11-05316ESL

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using the CM/ECF filing systems which will send notifications of such the Chapter 13 Trustee; and also certify that I have mailed by United State Postal Service copy of this motion to the following non CM/ECF participant debtor; Lilliam Leonor Linares Fuentes, and to all creditors and parties in interest in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 21st day of July, 2016.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
ATTORNEY FOR PETITIONER
USDC # 203614
PO BOX 186, CAGUAS, PR 00725
TEL NO 787-744-7699 FAX 787-746-529
EMAIL: rfigueroa@rfclawpr.com



046

San Alfonso

Date: 07/19/2016

Time: 10:15 am

Teller ID: 11

Trans. / Sequence	Trans. Description / Account Number	Amount
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215 9TH Withdrawal

XXXXXXXXXXXX7959

Amount

\$593.00

✓ 217 RELIABLE FINANCIAL Payment

063180367

Paid Amount

\$593.00

218 Paid To Client

\$100.00

Este recibo es el comprobante de sus transacciones. Consérvelo para reconciliar su estado de cuenta, para alguna reclamación o devoluciones de Especiales Musicales.

- Gracias por permitirnos Servirle !

TeleBanco Popular 787-724-3650 o 1-888-724-3650

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Label Matrix for local noticing
0104-3
Case 11-05316-ESL13
District of Puerto Rico
Old San Juan
Thu Jul 21 07:50:51 AST 2016

BANCO POPULAR PR
PO BOX 362708
SAN JUAN, PR 00936-2708

MIDLAND FUNDING LLC/RECOSER LLC
25 SE 2ND AVE STE 1120
MIAMI, FL 33131-1605

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

BANCO POPULAR DE PR
PO BOX 70100
SAN JUAN, PR 00936-8100

CITIFINANCIAL
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HANOVER, MD 21076-0499

Department of Treasury-
Bankruptcy Section (Suite 1504)
235 Ave. Arterial Hostos
San Juan Puerto Rico 00918-1451

GE Capital Retail Bank
c/o Recovery Management Systems Corp
25 SE 2nd Ave Suite 1120
Miami FL 33131-1605

MONEY EXPRESS
BANKRUPTCY DIVISION
PO BOX 9146
SAN JUAN PR 00908-0146

ORIENTAL BANK & TRUST
PO BOX 1952
HUMACAO, PR 00792-1952

BACK BOWL I LLC SERIES B
WEINSTEIN & RILEY P S
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(p)JEFFERSON CAPITAL SYSTEMS LLC
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PR ACQUISITIONS LLC
PR ACQUISITIONS LLC
PO BOX 194499
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CitiFinancial, Inc
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BANCO POPULAR DE PUERTO RICO
BANKRUPTCY DEPARTMENT
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COOP A/C LA PUERTORRIQUEA
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Granite Recovery LLC
c/o Recovery Management Systems Corp
25 SE 2nd Avenue Suite 1120
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Midland Funding LLC
by American InfoSource LP as agent
ATTN: Department 1
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Houston, TX 77210-4457

PR ACQUISITIONS LLC
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SAN JUAN PR 00919-4499

BANCO POPULAR DE PUERTO RICO PDVL
MORTGAGE SERVICING DEPARTMENT 762
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SAN JUAN, PR 00936-2708

MIDLAND FUNDING LLC BY AMERICAN INFOSOURCE L
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HOUSTON, TX 77210-4457

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VICK CENTER STE C402 867 MUNOZ RIVERA AV
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c/o Weinstein & Riley, P.S.
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FIRST BANK
MONEY EXPRESS
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JC PENNEY
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LILLIAM LEONOR LINARES FUENTES
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MONSITA LECAROS ARRIBAS
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ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
ST CLOUD, MN 56302-9617

(d)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
ST CLOUD MN 56302

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)RELIABLE FINANCIAL SERVICES
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SAN JUAN, PR 00928-1382

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Bypassed recipients 1
Total 38